

April 2, 2008

ENM-L-0438

Mr. Reinhard Knerr, Paducah Site Lead
Portsmouth/Paducah Project Office
U.S. Department of Energy
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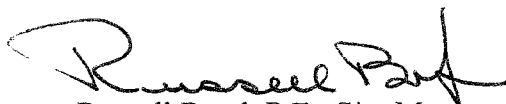
Dear Mr. Knerr:

**DE-AC30-06EW05001 – DELIVERABLE NO. 159 – POLLUTION
PREVENTION/WASTE MINIMIZATION PROGRAM PLAN FOR THE U.S.
DEPARTMENT OF ENERGY PADUCAH REMEDIATION PROJECT
(PRS/PROG/0015/R1)**

Paducah Remediation Services, LLC, (PRS) is providing the subject deliverable. This plan has been revised after an annual review. The revision incorporates features of the PRS Environmental Management System.

If additional information is needed, please contact Tracey Duncan at (270) 441-5167.

Sincerely,



Russell Boyd, P.E., Site Manager
Paducah Remediation Services, LLC

RB:SEK:kje

Enclosure

In accordance with the requirements of Contract DE-AC30-06EW05001 and as acknowledged by the above signature, I hereby certify that the information provided in this transmittal has been prepared in accordance with all applicable requirements and the information is, to the best of my knowledge and belief, true, accurate, and complete.

H-00015-2709



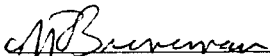
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**Pollution Prevention/Waste Minimization Program Plan
for the U.S. Department of Energy Paducah Remediation
Project**

This document is approved for public release per review by:


Paducah Classification and Control Office
Swift and Staley Team

1.29.08
Date

**Pollution Prevention/Waste Minimization Program Plan
for the U.S. Department of Energy Paducah Remediation Project**

Date Issued—February 2008

Prepared for the
U. S. Department of Energy
Office of Environmental Management

Prepared by
Paducah Remediation Services, LLC
managing the
Environmental Remediation Activities at the
Paducah Gaseous Diffusion Plant
under contract DE-AC30-06W05001

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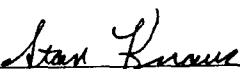
APPROVALS

Pollution Prevention/Waste Minimization Program Plan for the U.S. Department of Energy Paducah Remediation Project

PRS/PROG/0015/R1

February 2008

Stan Knaus
Pollution Prevention Coordinator


Signature

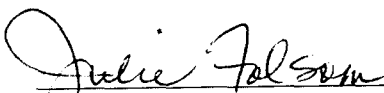
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Michael Gerle
Environmental Compliance and
Protection Manager


Signature

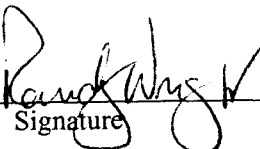
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Julie Folsom
Procurement Manager


Signature

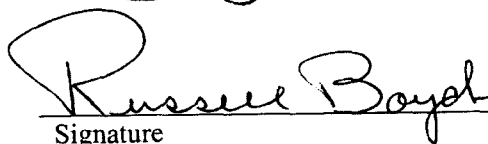
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Randy Wright
Training Manager


Signature

2/11/08
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Russ Boyd
Site Manager


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2/11/08
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ACRONYMS

DOE	U.S. Department of Energy
EC&P	Environmental Compliance and Protection
EPA	U.S. Environmental Protection Agency
PGDP	Paducah Gaseous Diffusion Plant
PP/WM	Pollution Prevention/Waste Minimization
PRS	Paducah Remediation Services, LLC
RCRA	Resource Conservation and Recovery Act
USEC	United States Enrichment Corporation

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EXECUTIVE SUMMARY

The U.S. Department of Energy (DOE) Paducah Remediation Project is required by DOE policy and Resource Conservation and Recovery Act permit conditions to have a Pollution Prevention/Waste Minimization (PP/WM) Program Plan. This plan satisfies those requirements by establishing policy, goals, and roles and responsibilities related to PP/WM. This plan also discusses the integration of PP/WM into the environmental management system.

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1. INTRODUCTION

1.1 PURPOSE

The purpose of this plan is to establish the policy, goals, and roles and responsibilities for the Paducah Remediation Project Pollution Prevention/Waste Minimization (PP/WM) Program. [Note: “Paducah Remediation Project” and “Paducah Site” mean the property, programs, and facilities at or near the Paducah Gaseous Diffusion Plant (PGDP) that are being remediated for the U.S. Department of Energy (DOE) by Paducah Remediation Services, LLC, (PRS).]

1.2 SCOPE

This plan applies to all PRS waste generating and handling operations and PRS personnel involved with these operations that are associated with DOE’s Paducah Site mission (described below). PRS subcontractors at the Paducah Site also shall meet the requirements of this plan. This document combines both Resource Conservation and Recovery Act (RCRA) requirements for having a formal waste minimization program and DOE requirements for a formal pollution prevention awareness program into one program plan.

1.3 PROGRAM PLAN STRUCTURE AND UPDATES

This plan was prepared based upon requirements and guidance contained in the following documents:

- Hazardous Waste Management Facility Permit [U.S. Environmental Protection Agency (EPA) ID # KY8-890-008-982], Part V, Waste Minimization—Objectives;
- Agreed Order DWM-30039-042 between DOE and the Kentucky Natural Resources and Environmental Protection Cabinet, September 10, 1997;
- *Pollution Prevention Program Plan 1996* (DOE 1996);
- *Guidance for Preparation of Site Pollution Prevention Plans* (DOE 1997);
- *Paducah Gaseous Diffusion Plant Site Treatment Plan 2006 Waste Minimization Progress Report*, PRS-ENM-0033 (PRS 2007a); and
- *Integrated Safety Management System Description and Environmental Management Description for the Paducah Environmental Remediation Project, Paducah Kentucky* (PRS 2007b).

This PP/WM Program Plan will be reviewed and updated, as necessary.

1.4 SITE DESCRIPTION AND MISSION

PGDP occupies 757 security-fenced acres located on a 3,556-acre tract in McCracken County, Kentucky. The historic mission of PGDP has been to produce enriched uranium. Construction of the PGDP began in 1951, with start-up occurring in 1952. Full operations were on-line by 1955, providing enriched uranium to both commercial and national defense reactors. Today, PGDP is an active uranium-enrichment facility consisting of a diffusion cascade and extensive support facilities.

The Energy Policy Act of 1992 mandated and established a new government corporation, the United States Enrichment Corporation (USEC), to lease and operate uranium enrichment facilities. As of July 1, 1993, USEC assumed responsibility for all facilities and activities related to the production of enriched uranium. USEC eventually was privatized in 1998.

DOE retained all facilities and activities related to environmental restoration and legacy waste management. The major operations responsibilities of DOE at the Paducah Site are environmental corrective actions; management of legacy PGDP wastes and wastes generated by current DOE activities; decontamination and decommissioning of designated facilities; maintenance of all facilities not leased to USEC; and management of the depleted uranium stored on-site. Since April 24, 2006, PRS has been DOE's Environmental Remediation contractor for the Paducah Site. The PRS scope of work includes environmental monitoring and reporting, environmental remediation, material disposition, facility disposition, and inactive and active facility surveillance and maintenance.

An agreement was negotiated between DOE and USEC concerning mixed waste generated after July 1, 1993. USEC must attempt a "good faith effort" to treat/dispose of the waste that it generates. The waste that USEC cannot treat or dispose of is stored and managed in DOE facilities; however, the liability associated with the waste remains with USEC. DOE is responsible for all PGDP waste generated prior to July 1, 1993, and all DOE waste generated since that time.

2. POLICY

The Paducah Site supports DOE's Pollution Prevention Program mission "to reduce and, where possible, eliminate the generation and release of DOE wastes and pollutants by implementing cost-effective pollution prevention techniques, practices, and policies." This plan also supports the targets and objectives established in the Environmental Management System.

2.1 POLICY STATEMENT

The Portsmouth/Paducah Project Office Environmental Policy Statement is provided in the appendix. This policy establishes the Paducah Site's commitment to the PP/WM Program and establishes minimum expectations.

2.2 ANNUAL PROGRAM CERTIFICATION

DOE and PRS site management are fully committed to minimizing the generation and toxicity of waste by giving preference to source reduction, material substitution, and environmentally sound recycling over treatment and disposal or release of such wastes. An annual certification statement will be signed by PRS senior management and made a part of the RCRA facility operating record in accordance with the following conditions in AAZZ1 Part V—Waste Minimization of the Hazardous Waste Management Facility Permit.

- Condition T-201—"General Restrictions: Pursuant to the specified regulation(s) in this condition, the Permittee must certify, no less often than annually, that: a) The Permittee has a program in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the Permittee to be economically practicable; and b) The proposed method of treatment, storage, or disposal is the most practicable method available to the Permittee which minimizes the present and future threat to human health and the environment. Based on the following regulation(s) effective 03/12/1997. [401 KAR 34:050 Section 4(2)(i)]"
- Condition T-202—"Recordkeeping Requirements: The Permittee shall maintain copies of this certification in the facility operating record by the regulation(s) specified in this condition. Based on the following regulation(s) effective 03/12/1997. [401 KAR 34:050 Section 4(2)(i)]"

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3. ROLES AND RESPONSIBILITIES

The PRS pollution prevention coordinator is responsible for overall coordination of the PP/WM Program at the Paducah Site; however, the success of the program is dependent on the actions of each employee. Roles and responsibilities of site personnel are described below and discussed further in Sections 4 and 5.

3.1 SITE MANAGER

The site manager is responsible for ensuring the Paducah Site's commitment to a successful PP/WM Program. The site manager approves related plans, policies, goals, and milestones. All PP/WM program submittals to DOE and/or regulatory agencies are approved by the site manager. The site manager signs the annual program certification statement discussed in Section 2.2.

3.3 PROCUREMENT MANAGER

The procurement manager is responsible for compliance with DOE environmentally preferable purchasing requirements. The procurement manager also is responsible for including all necessary requirements in subcontracts in order to ensure successful implementation of the site PP/WM Program.

3.4 ENVIRONMENTAL COMPLIANCE AND PROTECTION MANAGER

The environmental compliance and protection (EC&P) manager oversees PRS efforts to comply with PP/WM requirements, and evaluates the PP/WM Program for compliance with DOE policy and the RCRA permit on an annual basis. The EC&P manager also is responsible for ensuring that the waste minimization requirements of the RCRA permit are incorporated into the PP/WM Program and that PP/WM is incorporated in to the Environmental Management System.

3.5 POLLUTION PREVENTION COORDINATOR

The pollution prevention coordinator coordinates the PP/WM Program at the Paducah Site. Specific responsibilities include the following:

- Promote waste reduction, conservation of resources, and environmentally preferable purchasing;
- Provide guidance to site personnel on implementing effective PP/WM activities;
- Prepare and submit required reports;
- Support DOE-sponsored PP/WM programmatic activities, such as teleconferences, reporting and awards;
- Review and update, as necessary, this PP/WM Program Plan for the Paducah Site;
- Assist in reviews and updates of the environmental management system to ensure WM/PP values are included

- Assist with, or coordinate upon request, pollution prevention assessments;
- Review generator waste management plans for any project, as requested, and provide PP/WM guidance;
- Review training modules to ensure required PP/WM components are included
- Support the routine recycling programs at the Paducah Site; and
- Assist with any PP/WM training programs for Paducah Site personnel.

3.6 WASTE GENERATORS AND WASTE HANDLERS

All employees generate waste and are, therefore, waste generators. Waste generators are responsible for properly managing their waste to minimize releases and the inadvertent mixing of different waste streams. Waste generators and waste handlers also are required to support and promote pollution prevention. Specific responsibilities include the following:

- Plan and implement projects in accordance with the PP/WM principles documented in this plan, the Waste Management Plan for the Paducah Environmental Remediation Project (PRS 2006), and the environmental management system;
- Incorporate PP/WM principles and strategies into program procedures and work control processes, as appropriate;
- Track and report activities related to waste minimization and pollution prevention activities;
- Conduct pollution prevention assessments, including formal pollution prevention opportunity assessments, as needed for specific projects or programs;
- Support the development and implementation of new pollution prevention techniques;
- Implement source reduction, materials reuse, environmentally preferable purchasing, and recycling activities; and
- Certify uniform hazardous waste manifests, as appropriate, that the waste minimization statement in 40 *CFR* § 262.27(a) or (b) is true.

4. SITE PP/WM PROGRAM STRATEGY AND GOALS

4.1 STRATEGY

The Paducah Site is actively committed to minimizing wastes and is always implementing activities to achieve this goal. Specific PP/WM strategies are being revised continually to accommodate current projects and programs.

Activities at the Paducah Site result in the generation of cleanup, stabilization, and decommissioning wastes as opposed to "routine" process wastes. The principles of waste minimization that have been formulated by the EPA and generally adopted by industry are geared toward large-scale industrial processes with little change in material feedstock, end product, and routine waste generated. The EPA methodology revolves around a thorough analysis of processes and concentrates on material substitution and process changes. This methodology generally is not adequate for addressing wastes generated by cleanup, stabilization, and decommissioning activities. For instance, environmental remediation activities where the purpose of the work is to remove relatively low concentrations of hazardous chemicals and radionuclides from large quantities of soil and water having specific start and completion dates and result in a variety of waste streams with sporadic generation rates. Therefore, it often is necessary to develop innovative methods for achieving and measuring PP/WM. It is preferable to measure environmental remediation PP/WM achievements by gains in efficiency, economy, and reduction of secondary waste.

The Paducah Site PP/WM strategy includes source reduction, material substitution, environmentally preferable purchasing, recycling/reuse, and best management practices, and focuses on the following:

- Determining during the planning process of where the application of PP/WM principles would have the greatest effect including the identification of potential options and techniques and their costs;
- Implementing planned PP/WM activities and the documenting of waste minimized and any savings achieved;
- Planning to ensure that remedial actions take into account the costs and risks associated with the management of waste;
- Developing of management tools that give useful measures of program success;
- Using existing resources to the maximum extent practical;
- Researching new and available technologies for minimizing waste; and
- Tracking and reporting waste generation and waste minimization data.

4.2 UNIVERSAL WASTE

Recycled materials, such as batteries, fluorescent bulbs, mercury switches, and unused portions of pesticides and herbicides, are handled as universal waste (as defined by 401 KAR 43:010 and 40 CFR § 273). If managed as universal waste these materials would not be subject to hazardous waste regulations. This encourages recycling the materials rather than disposal.

4.3 PROGRAM OBJECTIVES

The primary objectives of the Paducah Site PP/WM Program are (1) to eliminate or reduce the amount and toxicity of all waste generated at the site through appropriate planning and implementation; and (2) to comply with federal and state regulations and DOE requirements for waste minimization. Secondary objectives include the following:

- Achieving operating economy and efficiency by applying the principles of waste minimization;
- Fostering a philosophy to conserve energy and resources;
- Promoting the use of nonhazardous materials to minimize the risks to human health and the environment;
- Reducing waste disposal costs;
- Exchanging waste minimization information through technology transfer, outreach, and educational networks;
- Enhancing employee awareness of pollution prevention goals, objectives, methods, and responsibilities; and
- Creating incentives for conducting successful PP/WM activities.

4.4 ENVIRONMENTAL MANAGEMENT SYSTEM

PP/WM is identified in the Environmental Management System. Each organization has identified environmental aspects. These are elements of an organization's activities, products, or services that can interact with the environment. The environmental aspect of an activity is that part which creates a possibility for an environmental impact. Environmental impacts are changes to the environment, whether adverse or beneficial, wholly or partially resulting from site activities, products, or services. Once the significant environmental aspects of activities are identified, the objectives and targets can be established. Environmental aspects for the Paducah Site area identified in the, Integrated Safety Management System Description and Environmental Management Description (PRS 2007a).

4.5 OBJECTIVES AND TARGETS

The Paducah Site has established objectives and targets based on the environmental policy, legal and other requirements, consideration of the significant environmental aspects, DOE's goals for environmental cleanup, and the views of its stakeholders. WM/PP is included in the development of objectives and targets. The environmental objectives and targets are derived from the significant environmental aspects.

The environmental management system, which includes PP/WM, is part of the work planning process for all activities. The environmental management system is reviewed and updated periodically. These reviews and updates will include PP/WM values.

5. POLLUTION PREVENTION ACTIVITIES AND RESOURCE REQUIREMENTS

5.1 EMPLOYEE INVOLVEMENT AND PARTICIPATION

All Paducah Site personnel are affected by and, therefore, need to be involved in the PP/WM Program. Successful program participation and employee involvement is enhanced by the following:

- Providing up-to-date PP/WM information and training to site personnel;
- Recognizing employees for pollution prevention efforts;
- Publicizing pollution prevention progress in reports, bulletins, and other publications;
- Involving employees in project-specific pollution prevention activities;
- Involvement through the Integrated Safety Management System and Environmental Management System; and
- Partnering with employee-supported charitable organizations.

5.2 POLLUTION PREVENTION AWARENESS

Pollution prevention awareness is required by DOE and is a key element to program success. A long-term goal is to incorporate PP/WM into all levels of the decision-making process through the Integrated Safety Management System and Environmental Management System.

5.3 TRAINING

All Paducah Site employees are required to complete training that includes the fundamentals of pollution prevention and waste minimization when hired and again every two years [Hazardous Waste Management Facility Permit condition T-203 (b)]. Additional training is provided to workers involved with hazardous waste management. Additional PP/WM training is provided on an as-needed basis.

5.4 IMPLEMENTATION

Pollution prevention and waste minimization are implemented through the work control process [Hazardous Waste Management Facility Permit condition T-203 (c)]. The environmental compliance organization provides oversight of work plans and work instruction to verify PP/WM work practices are utilized.

5.5 INCENTIVE AWARDS AND RECOGNITION

Incentive and award programs are used to recognize individual and team PP/WM achievements. Potential awards for which successful projects and activities may be submitted include PRS awards, DOE awards,

and other awards from various outside organizations. Participation in awards programs is strongly encouraged by the PP/WM Program. Employees also are recognized for their efforts through articles published in bulletins.

5.6 PROGRAM EVALUATION

5.6.1 Quality Assurance

The Paducah Site has developed a Quality Assurance Plan, as required by DOE Order 414.1, that applies to all Paducah Remediation Project programs, including the PP/WM Program. The, Quality Assurance Program Plan for the Paducah Environmental Remediation Project (PRS 2008), is updated annually.

5.6.2 Self-Assessment

The PP/WM Program for the Paducah Site will be evaluated as necessary to plan for activities, budget, and schedule. Program achievements and milestones will provide some basis for the site performance evaluation. The pollution prevention coordinator will use the following criteria in assessing this program:

- Verification that the site PP/WM Program Plan contains the elements required by DOE;
- Assessment compliance with required elements;
- Assessment of inclusion of PP/WM activities in the environmental management system; and
- Evaluation of waste generator awareness of pollution prevention concepts.

5.7 TRACKING AND REPORTING

5.7.1 Tracking

The PRS Material Disposition Program has a comprehensive and computerized waste tracking system that can identify waste types, waste quantities, generation dates, and other information. Data to be input into the system is derived from the Request for Disposal form. The Request for Disposal form is required for the storage, treatment, or disposal of all waste generated at the Paducah Site. The Paducah Site does not have a comprehensive computerized system for entering and tracking information on specific PP/WM activities. Individual projects and programs are expected to develop their own means for tracking PP/WM activities

5.7.2 Reporting Requirements

The Paducah Site must prepare or provide input to various reports to comply with federal and state regulations and DOE requirements related to PP/WM. Some of these reports include the following:

- DOE annual PP/WM accomplishments report;
- DOE annual report on environmentally preferable purchasing;
- Kentucky Division of Waste Management/EPA RCRA annual report;
- Emergency Planning and Community Right-to-Know Act Report, Section 313; and
- Annual Site Treatment Plan Waste Minimization Progress Report.

5.8 RECYCLING AND REUSE PROGRAMS

Recycling and reuse are crucial to the Paducah Site PP/WM mission. There are many waste streams that have the potential for beneficial reuse by being sent to off-site vendors for recycling or by reusing materials and equipment from one project to another. Currently, printer and fax toner cartridges, aluminum cans, office paper, batteries, and telephone books are recycled on a routine basis.

The Paducah Site will continue to determine whether or not a waste stream is a good candidate for recycling based on the following criteria: (1) cost/benefit of recycling versus disposal, (2) feasibility of the material for radiological release, (3) availability of vendors to recycle the material, (4) recycling technology, (5) liability, and (6) resource allocation.

5.9 POLLUTION PREVENTION ASSESSMENTS

Each major program will conduct, when needed, a pollution prevention assessment to determine how well the program meets the requirements of this plan and what improvements can be made. Each project will be planned and implemented in accordance with the PP/WM principles adopted at the site and the environmental management system.

5.10 INFORMATION AND TECHNOLOGY EXCHANGE

Information and technology exchange is an integral part of the PP/WM Program. It occurs both formally and informally. Such exchange takes place at regular meetings and teleconferences coordinated by DOE programs and by contact with other PP/WM experts. In addition, attendance at seminars, conferences, and training classes promotes information exchange.

All site personnel are encouraged to use the EPA Pollution Prevention Electronic Information System database (<http://www.epa.gov/ebtpages/pollutionprevention.html>) and other available resources for PP/WM information and ideas that can be applied to their projects and activities. Further information on these resources is available from the pollution prevention coordinator.

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6. REFERENCES

- Commonwealth of Kentucky Natural Resources and Environmental Protection Cabinet 1997. Agreed Order, File No. DWM-30039-042, September.
- Commonwealth of Kentucky Natural Resources and Environmental Protection Cabinet 2004. Hazardous Waste Facility Operating Permit – Renewal, No. KY88990008982, October.
- DOE 1996. *Pollution Prevention Program Plan 1996*, DOE Headquarters, May.
- DOE 1997. *Guidance for the Preparation of Site Pollution Prevention Plans*, DOE Office of Environmental Management.
- PRS (Paducah Remediation Services, LLC) 2006. *Waste Management Plan for the Paducah Environmental Remediation Project Paducah, Kentucky*, PRS-CDL-0029, March.
- PRS 2007a. *Paducah Gaseous Diffusion Plant Site Treatment Plan 2006 Waste Minimization Progress Report*, PRS-ENM-0033, March
- PRS 2007b. *Integrated Safety Management System Description and Environmental Management Description for the Paducah Environmental Remediation Project, Paducah Kentucky*, PRS-CDL-0061/R1, February
- PRS 2008. *Quality Assurance Program Plan for the Paducah Environmental Remediation Project, Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, PRS-CDL-00058/R2, January.

APPENDIX

**PORTSMOUTH/PADUCAH PROJECT OFFICE
ENVIRONMENTAL POLICY STATEMENT**

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**Department of Energy
Office of Environmental Management
Portsmouth/Paducah Project Office**

ENVIRONMENTAL POLICY STATEMENT

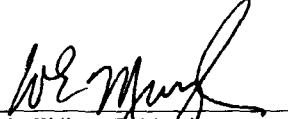
The U.S. Department of Energy's (DOE) Office of Environmental Management, Portsmouth/Paducah Project Office (PPPO), is committed to excellence and leadership in protecting the environment. It is the policy and practice of the PPPO to conduct its operations in a manner that protects human health and the environment and to be in full compliance with environmental laws, regulations, and other requirements. The PPPO accomplishes this by systematically and fully integrating environmental considerations into the planning and execution of work at all levels so that the mission of the PPPO is successfully accomplished for the benefit of the public, the worker, and the environment.

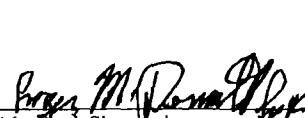
Executive Order 13148, *Greening the Government through Leadership in Environmental Management*, assigns responsibility to the head of each Federal agency to ensure the integration of environmental accountability into day-to-day decision-making and long-term planning through the development and implementation of environmental management systems (EMS). Additionally, the DOE has made it clear that protection of the environment and the public is of paramount importance by requiring the integration of environmental programs into all work activities as stated in DOE Order 450.1 and must also be incorporated into the Integrated Safety Management Systems established pursuant to DOE Order 450.4.

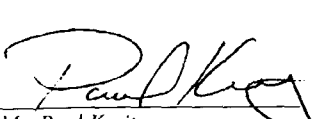
Through employee involvement and management commitment to environmental excellence, the PPPO will:

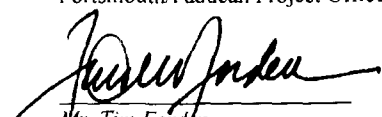
- Adhere to all environmental regulations and incorporate waste reduction and recycling into all daily operations at the lowest possible life-cycle cost.
- Control operations in a manner that reduces the hazards associated with the work being performed and use pollution prevention projects and activities to improve the PPPO environmental posture.
- Evaluate projects using up-front risk analyses to identify hazards, control these hazards through engineering design, and reduce or eliminate these hazards using waste minimization and pollution prevention techniques.
- Manage hazardous and radioactive materials and wastes generated from daily operations in a safe, compliant, and cost-effective manner. Establish and communicate environmental responsibilities, provide training, and implement controls to mitigate hazards.
- Involve workers in the development and execution of environmental management programs and objectively and fully communicate environmental information to the PPPO employees, contractors and subcontractors, stakeholders, and the public.
- Conserve natural resources by reusing and recycling materials and by purchasing and using environmentally preferable products.
- Integrate sustainability principles into the design and construction of new facilities and ensure energy efficiency is considered in each PPPO project and/or activity.

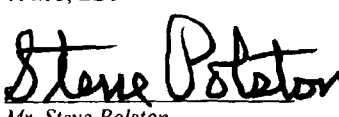
The PPPO seeks to demonstrate its corporate and environmental citizenship by continuously striving toward sustainability. Reaching environmental accountability will depend upon the commitment and contribution of each employee. We count on your support to achieve environmental excellence at the PPPO sites.

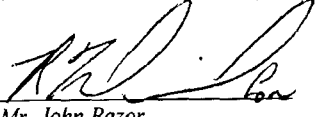

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